

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION

PHARMMD SOLUTIONS, LLC,

Plaintiff,

v.

DENISE KEHOE and
PERFORMRX, LLC,

Defendants.

Case No.: 3-11-cv-00255

**PLAINTIFF'S RENEWED APPLICATION FOR TEMPORARY RESTRAINING
ORDER AND MOTION FOR TEMPORARY INJUNCTION**

Plaintiff PharmMD Solutions, LLC ("PharmMD") moves this Court for the issuance of an Order temporarily restraining Defendant Denise Kehoe ("Kehoe"), and Kehoe's current employer, Defendant PerformRX, LLC ("PerformRX"), and all persons acting in concert with them, from retaining, disclosing, or using any of PharmMD's Work Product, Confidential Information, and Trade Secrets¹; breaching or procuring the breach of the terms of the Nondisclosure, Non-Competition, and Non-Solicitation provisions of the four agreements between Defendant Kehoe and PharmMD; and/or tortiously interfering with PharmMD's contracts and business relations. In the alternative, PharmMD requests an emergency hearing as more fully set forth in Plaintiff's Motion for Immediate Emergency Hearing Prior to March 25, 2011 filed simultaneously herewith.

The urgency of this request is based on irreparable harm PharmMD will suffer should Defendant Kehoe be permitted to **speak this coming weekend, March 25-28, 2011, at a**

¹ For purposes of the instant action, the terms Work Product, Confidential Information, and Trade Secrets are being used as those terms are collectively defined in the four agreements signed by Defendant Kehoe, specifically Defendant Kehoe's Employment Agreement with PharmMD, PharmMD's Purchase Agreement, PharmMD's Operating Agreement, and the Non-Disclosure Agreement Defendant Kehoe signed. For example, such Work Product, Confidential Information and Trade Secrets includes but is not limited to PharmMD's core Medication Therapy Management ("MTM") services business plans, models, formulas and methodologies.